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December 8, 2004

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Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte Notice

Amendment of Part 22 of the Commission's Rules to Benefit the
Consumers of Air-Ground Telecommunications Services
WT Docket No. 03-103

Dear Ms. Dortch:

On December 7, 2004, Gregory L. Rohde, founder of the consulting group E-Copernicus, on behalf of Space Data Corporation ("Space Data"), conducted separate telephone discussions with Commissioners Michael J. Copps, Kevin J. Martin, and Jonathan S. Adelstein regarding the above-referenced proceeding.

Mr. Rohde emphasized that the Commission's stated primary objective in reassigning air-to-ground ("ATG") spectrum was to bring competition to the ATG market that is now controlled by a single provider. Although the ATG spectrum band is limited to 4 MHz, Mr. Rohde noted that parties in this proceeding have stated that they require at most 3 MHz of spectrum to provide broadband ATG services, and that Space Data can provide narrowband ATG services using 1 MHz of spectrum. Mr. Rohde stated that the Commission can ensure two competitors in the ATG market by using a form of combinatorial bidding to auction the ATG licenses. The Commission, however, should prohibit any single licensee and its affiliates from holding the entire 4 MHz of ATG spectrum. Mr. Rohde argued that allowing one company to acquire all 4 MHz of spectrum would perpetuate the existing monopoly in the ATG market and conflict with the Commission's statutory objective to promote competition.

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Pursuant to Section 1.1206(b) of the Commission's rules, an electronic copy of this letter is being filed with the office of the Secretary. If you have any questions regarding this notification, please contact the undersigned.

Very truly yours,

/s/ Cheryl A. Tritt

Cheryl A. Tritt
Counsel to Space Data Corporation

cc: Commissioner Michael J. Copps
Commissioner Kevin J. Martin
Commissioner Jonathan S. Adelstein